



AUDIT & COMPLIANCE COMMITTEE OF THE BOARD OF DIRECTORS

Corporate Compliance Report

November 15, 2018



COOK COUNTY HEALTH
& HOSPITALS SYSTEM
CC+HHS

Meeting Objectives

- Review Privacy & Security Rules
- Recognize the National Landscape
- Discuss Current Internal Activity
- View CCH Measures for Compliance
 - Proactive
 - Reactive



The “Alphabet Soup” of Privacy

- The Health Insurance Portability and Accountability Act
 - 2003 – HIPAA Privacy Rule
 - 2005 – HIPAA Security Rule
- Patient/member privacy rights related to health data
- Key Terms:
Protected Health Information (PHI) and
Electronic Protected Health Information (ePHI)
- CCH has a responsibility to safeguard PHI and ePHI





REUTERS

TECHNOLOGY NEWS OCTOBER 19, 2018 / 4:56 PM / 6 DAYS AGO

U.S. CMS says 75,000 individuals' files accessed in data breach

(Reuters) - The U.S. Centers for Medicare & Medicaid Services (CMS) said on Friday it was responding to a data breach that exposed the files of about 75,000 individuals.

TULSA WORLD

Data breach at OSU Center for Health Sciences may have exposed Medicaid patient information

From Staff Reports Jan 5, 2018

Nearly 280,000 Medicaid patient records breached in Oklahoma State University Center for Health Sciences.

Des Moines Register

PART OF THE USA TODAY NETWORK

UnityPoint warns 1.4 million patients their information might have been breached by email hackers

Tony Leys, Des Moines Register Published 3:42 p.m. CT July 30, 2018 | Updated 4:22 p.m. CT July 30, 2018

HEALTH IT SECURITY

xtelligent HEALTHCARE MEDIA

March 13, 2018

By **Elizabeth Snell**

A New York surgery center reported a potential data breach stemming from a server being accessed by an unauthorized user.

Modern Healthcare

The leader in healthcare business news, research & data

Anthem to pay \$16M in record data breach settlement

By **Erica Teichert** | October 16, 2018

Anthem has agreed to pay the federal government \$16 million in a settlement over its 2015 data breach that hit **nearly 79 million people**, HHS said Monday.

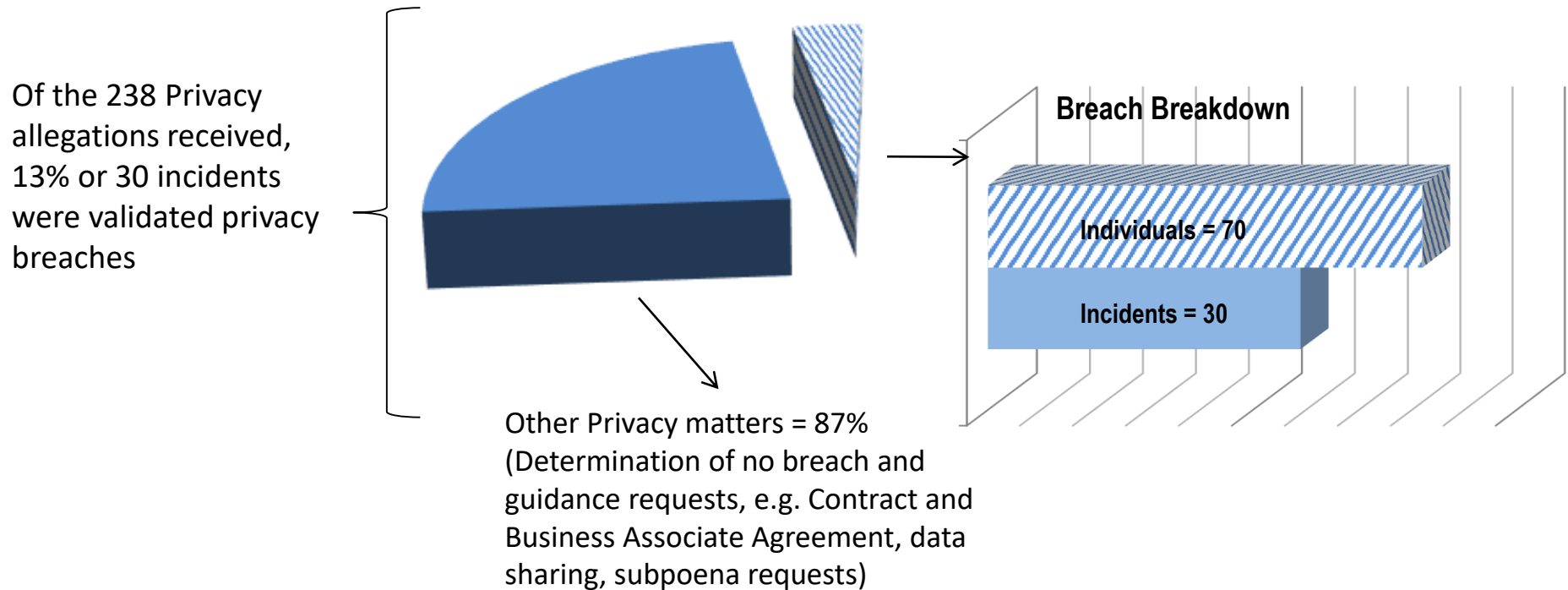
The agreement is by far the largest settlement reached by HHS' Office for Civil Rights for a Health Insurance Portability and Accountability Act breach. Hackers stole the names, birth dates, Social Security numbers, home addresses and other personal information in the **2015 cyberattack**.

As part of the settlement, Anthem agreed to a corrective action plan where it will conduct a risk analysis and fix any deficiencies. HHS will oversee Anthem's work.

Privacy Allegations Received by Compliance

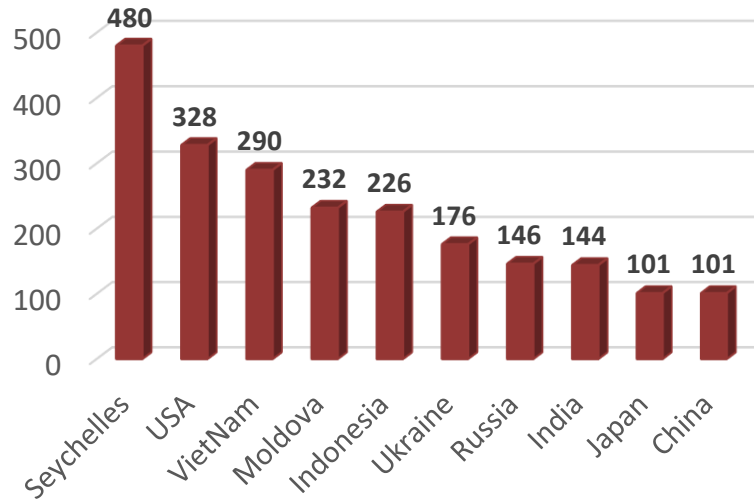
F-YTD 238 Issues Attributed to HIPAA

26% of the Total Issues Received F-YTD



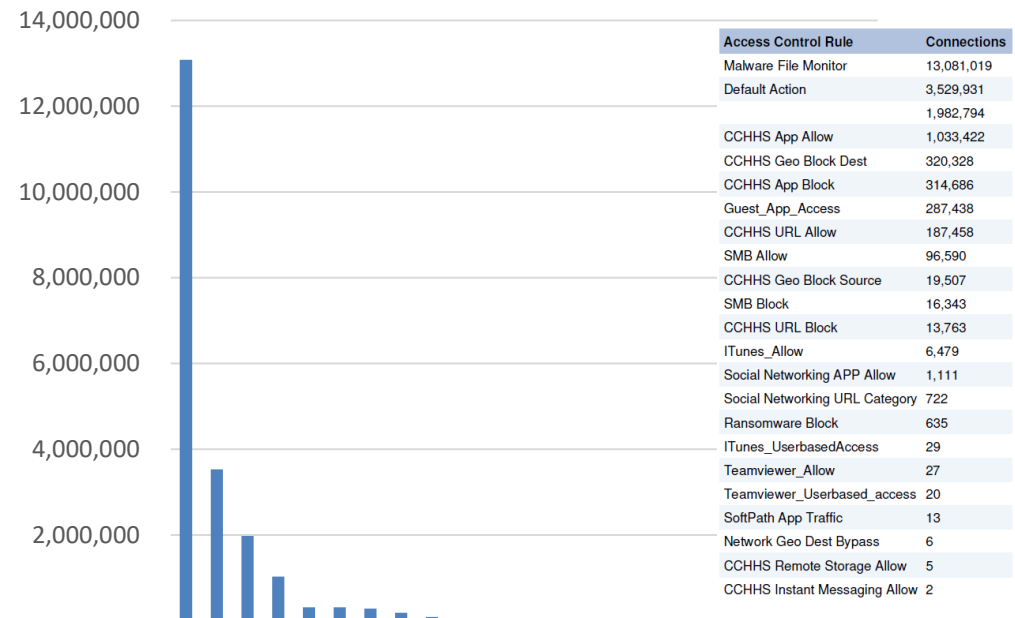
Security Intelligence

Intrusion Events



Sample Reports Received Monthly

Connection Events



CCH Proactive & Reactive Measures

Security Tools

- Intruder Prevention (Cisco Firepower)
- MS Office 365 (Recent Optimizations)
- Infoblox Secure DNS (How it helps with Phishing Attacks)
- Cerner 724 Read-Only upgrade to 724 Access Downtime Viewer (Business Continuity Plan/Disaster Recovery)
- Cerner Instant Access (Security and Authentication)



Additional Security Controls

- Updated privacy & security training
- Adapted policies to evolving environment including
 - Mobile Device Management
(also implementing controls)
- Developed vendor questionnaire



Future Initiatives

- Optimizing medical device management
- Developing an anti-phishing program
- Enhancing asset control through IT Service Management (ITSM)
- Requiring multi-factor-authorization (remote access)

